

Exhibit 3

Tonawanda
Coke

Region 9 - Environmental Quality Office
584 Delaware Avenue
Buffalo, NY 14202

April 23, 1980

J.D. Crane, President
Tonawanda Coke Corporation
Box A-500
Tonawanda, NY 14150

Dear Mr. Crane:

In our meeting on January 17, 1980, we discussed your willingness to accept control requirements on other aspects of coke oven emissions more stringent than those stated in Part 214 in lieu of pushing controls. In furtherance of this approach, on March 26, 1980, the Region 9 Office mailed Tonawanda Coke Corporation the emission factors used by NYSDEC for by-product coke oven batteries. It was our understanding that Tonawanda Coke would use this material to propose alternative emission reductions in place of pushing controls.

At this point, I feel that the Tonawanda Coke Corp. should proceed to submit a formal application for exception under 214.9(a) for those requirements in Part 214 which you deem excessively burdensome complete with specific data in support of your claim. Additionally, a detailed proposal of the more expeditious application of the alternative coke oven emission reductions that you are willing to accept should be formally submitted to be incorporated into a Commissioner's Order.

Both the Regional and Central Office staff feel that you should expedite the submission of the above-noted material so that we can demonstrate to EPA that we have an agreement consistent with our SIP ready to go into effect as soon as they take final approval action on our SIP.

If you have any questions on this matter or if you feel another meeting will be beneficial, please give me a call.

Very truly yours,

Stanley Gubner, P.E.
Principal Air Pollution
Control Engineer

SG:ec

cc: Messrs Hovey, Davis, Burke